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July 2, 2008

The Hon. Gerard E. Lynch
United States District Court
Southern District of New York
500 Pearl Street
New York, New York
VIA E.C.F.

Re.: United States v. Michael Bass
07 Cr. 887 (GEL)

Dear Judge Lynch:

Please accept this letter to adjourn the sentence of this matter currently scheduled for July 27, 2008. Due to unforeseen circumstances I will not have sufficient time to prepare this case for sentencing by the 27th. Specifically, there has been and continues to be a “chicken pox quarantine” at the M.D.C. where the defendant is housed.

The defendant has participated in the pre-sentence interview and the Probation Department has generated a pre-sentence report. However, due to the chicken pox quarantine I have been unable to visit the defendant to adequately review it. Today I again contacted the M.D.C. and was informed that the quarantine is of indefinite duration. The inability to visit Mr. Bass has a rippling affect: my preparation of objections to the psr is now delayed, which in turn will delay the final psr and not until I have that will I be in a position to once again visit Mr. Bass to review same and then only after that point will I be ready to submit a sentence memorandum to Your Honor. In addition, we must also schedule a “safety valve” proffer session before sentence, which must then be evaluated and any determination with respect thereto must be utilized in our sentence submission.

Given the respective trial and summer schedules of the parties herein relative to the tasks that must occur herein, a continuance must be requested. Mr. Bass is facing a lengthy jail sentence and I want to be able to have sufficient time to present the best possible arguments on his behalf.

Wherefore, it is respectfully requested that the Court continue this matter to an available September date.

Most Respectfully Submitted,

Christopher Booth
Attorney For Michael Bass